

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ALEXANDER STYLLER, INTEGRATED
COMMUNICATIONS & TECHNOLOGIES,
INC., JADE CHENG, JASON YUYI, CATHY
YU, CAROLINE MARAFEO CHENG,
PUSHUN CHENG, CHANGZHEN NI,
JUNFANG YU, MEIXIANG CHENG,
FANGSHOU YU, and CHANGHUA NI,

Plaintiffs,

vs.

HEWLETT-PACKARD FINANCIAL
SERVICES COMPANY, HEWLETT-
PACKARD FINANCIAL SERVICES (INDIA)
PRIVATE LIMITED, HP INC., HEWLETT
PACKARD ENTERPRISE COMPANY, and
DAVID GILL

Defendants.

Civil Action No. 1:16-CV-10386 (LTS)

**DEFENDANTS' MOTION TO IMPOUND
UNIFIED STATEMENT OF UNDISPUTED MATERIAL FACTS**

Defendants Hewlett-Packard Financial Services Company, Hewlett-Packard Financial Services (India) Private Limited, HP Inc., Hewlett-Packard Enterprise Company, and David Gill (collectively, "Defendants") hereby move, pursuant to Local Rule 7.2, that the Court impound certain statements in the Parties' Unified Statement of Undisputed Material Facts ("SOF") ([Dkt. No. 341](#)) until further order of the Court. Grounds for this motion are as follows:

1. In the SOF, Plaintiffs reference and quote from exhibits that the Court has allowed to be filed under seal pursuant to Plaintiffs' Assented-To Motion to Impound Exhibits. [Dkt. No. 335](#), Dkt. No. 336. These exhibits are documents designated by Defendants as "CONFIDENTIAL" under the Joint Stipulated Protective Order ("Protective Order") entered in this case ([Dkt. No. 186](#)).

2. The Protective Order mandates that all materials designated as “CONFIDENTIAL” shall be filed under seal. [Dkt. No. 186](#), ¶ 9.

WHEREFORE, in an effort to comply with their obligations under the Protective Order, Defendants respectfully request that certain statements in the SOF be impounded until further order of the Court. Upon termination of the impoundment period, outside counsel for Defendants will retrieve and take custody of the impounded materials.

Dated: April 30, 2020

Respectfully submitted,

/s/ Kevin C. Quigley

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Counsel for Defendants

CERTIFICATION UNDER LOCAL RULE 7.1(a)(2)

I, Kevin C. Quigley, counsel for Defendants, certify that on April 30, 2020, I conferred with Dmitry Joffe, counsel for Plaintiffs, concerning the subject of this Motion. We conferred in good faith but were unable to resolve or narrow the issues in dispute.

/s/ Kevin C. Quigley
Kevin C. Quigley

CERTIFICATE OF SERVICE

I, Christina T. Lau, Attorney for Defendants Hewlett-Packard Financial Services Company, Hewlett-Packard Financial Services (India) Private Limited, HP Inc., Hewlett Packard Enterprise Company, and David Gill, hereby certify that the foregoing document was filed using the CM/ECF system and electronic notice will be sent to registered participants as indicated on the Notice of Electronic Filing (NEF) on April 30, 2020.

/s/ Christina T. Lau

Christina T. Lau